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November 10, 2014

BY FACSIMILE

The Honorable Laura Taylor Swain
United States District Court Judge
United States District Court for the Southern District
of New York
500 Pearl St., Room 12D
New York, NY 10007-1312

Re: Excess Line Association of New York v. The Hanover Insurance
Company and Massachusetts Bay Insurance Company
14-cv-8345 (LTS)(GWG)

Dear Judge Swain:

We represent The Hanover Insurance Company and Massachusetts Bay Insurance Company, defendants in the above-referenced action, which we removed to this Court on October 17, 2014. This letter constitutes our submission regarding removal and diversity jurisdiction, as required by Your Honor's October 24, 2014 Initial Conference Order:

- (a) All of the defendants in this action joined in the notice of removal.
- (b) The notice of removal was not dated more than thirty (30) days after the first defendant was served.
- (c) The action was removed on grounds of diversity jurisdiction; neither of the defendants are citizens of New York State.
- (d) The citizenship of all named parties -- New York for the plaintiff and Massachusetts and New Hampshire for each of the defendant corporations -- is set forth in the notice of removal.

We also note that on November 6, 2014, plaintiff filed a First Amended Complaint in this Court. In that pleading, plaintiff confirms the citizenships of the parties as set forth in the Notice of Removal and contends that this Court has jurisdiction pursuant to 28 U.S.C. § 1332.

November 10, 2014
Page 2

Respectfully,

Gary Meyerhoff /ERK

Gary Meyerhoff

cc: Josh Gold, Esq., counsel for Plaintiff